

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STEPHEN WALSH,
Plaintiff,

CIVIL ACTION
NO: 04-12595-RGS

vs.

WOODS HOLE, MARTHA'S VINEYARD
AND NANTUCKET STEAMSHIP
AUTHORITY,
Defendant.

DEFENDANT'S PROPOSED SCHEDULING STATEMENT

Now come the defendant, Woods Hole, Martha's Vineyard & Nantucket Steamship Authority, in the above-entitled action, by and through its undersigned attorneys, Clinton & Muzyka, P.C., and hereby submits its proposed Scheduling Statement.

I. DISCOVERY PLAN

- A. All factual depositions to be completed by November 18, 2005.
- B. Plaintiff's designation of experts and disclosure of expert information and reports pursuant to the Federal Rules of Civil Procedure served on or before December 16, 2005.
- C. Defendant's designation of experts and disclosure of expert information and reports pursuant to the Federal Rules of Civil Procedure served on or before January 13, 2006.
- D. All expert depositions to be completed by February 17, 2006.
- E. Final Pretrial Conference to be scheduled after April 14, 2006.

II. MOTION SCHEDULE

In addition to the above, the parties propose the following motion schedule.

- A. Motions to amend the pleadings, to add parties or to set forth additional claims to be filed on or before June 17, 2005.
- B. Dispositive Motions to be filed by March 17, 2006 with Oppositions filed within twenty-one (21) days as set forth in the Local Rules of this Court.

III. CERTIFICATION

The defendant has filed its Rule 16.1 certification.

IV. TRIAL BY MAGISTRATE JUDGE

The defendant does not consent to trial by a Magistrate Judge at this time.

V. SETTLEMENT

The plaintiff has not tendered a written demand.

WHEREFORE, the defendant, Woods Hole, Martha's Vineyard & Nantucket Steamship Authority, prays that this Honorable Court adopt the scheduled proposed herein.

By its attorneys,

CLINTON & MUZYKA, P.C.

"/S/Kenneth M. Chiarello"

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Dated: May 13, 2005